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Via ECF

The Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Garcia Luna* 19 Cr. 576 (BMC)

Dear Judge Cogan,

We write to respectfully request an additional adjournment of the due dates for post-trial motions and the sentencing in the above captioned matter. Currently defense post-trial motions are due on July 7, 2023, government opposition is due on August 4, 2023, and defense reply is due on August 18, 2023. Sentencing is currently scheduled for September 27, 2023.

As the Court may recall, we previously sought an adjournment to the post-trial motion briefing schedule because, following the verdict in February, several individuals including former Mexican and U.S. law enforcement officials contacted us with potential new evidence favorable to the defense that could result in the filing of a Rule 33 motion for a new trial. It seems that as more individuals become aware of the nature of the evidence against Mr. Garcia Luna, even more former officials and others contact us with information that they believe would have been helpful to the defense at trial. Furthermore, within the past month, we were provided with thousands of pages of material, audio, and video files potentially relevant to the case that we have never seen before and are diligently reviewing. The vast majority of this new material is in the Spanish language, therefore, only the Spanish speaking members of our team can review it, thereby slowing down our review. We understand that this cannot be an indefinite process, however, the materials we have received are directly relevant to the case and many are law enforcement materials.

Accordingly, we respectfully request that the dates contained in the post-trial briefing schedule and the date for sentencing all be adjourned to the following dates: (1) defense post-trial motions due December 15, 2023; (2) government opposition due January 19, 2024; (3) defense reply February 2, 2024; and (4) sentencing March 1, 2024.

Respectfully submitted,

/s/

César de Castro
Valerie Gotlib
Shannon McManus
Florian Miedel

Cc: all counsel of record (via ECF)